DECODING THE SCHOOL NUTRITION PROGRAMS

ASBO April 25, 2017



School Nutrition Association (SNA) of South Dakota

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Agenda

- Preparation for the Administrative Review
- School Nutrition101 for BusinessManagers
- USDA Foods (Commodities)MaximizingFederal Funds
- Hot Topics

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PREPARING FOR A SCHOOL FOOD SERVICE REVIEW

The Administrative Review

AR Reinvention Goals

- The Healthy Hunger-Free Kids Act of 2010 called for a more effective and efficient review process
- Consolidated the review process
- Incorporated school breakfast, the new meal pattern, and dietary specifications, and the performance-based reimbursement
- Implement a 3-year review cycle

Previously the reviews were separated into a CRE (Coordinated Review Effort) and the SMI (school meals initiative)

Long story...

The administrative review process – traditionally called the "Coordinated Review Effort" or CRE –used to ensure compliance with federal law and regulations in the operation of the school nutrition programs. The passage of the Healthy, Hunger Free Kids Act of 2010 resulted in significant changes in the school lunch and school breakfast programs. Central to this is the mandate for USDA to develop a unified monitoring process, which involves combining elements of the Coordinated Review Effort (CRE) and the School Meal Initiative (SMI) review. CANS must monitor SFAs to ensure compliance with the new administrative and dietary regulations for school meals.

Why Is There a Review?

- To Ensure Program Integrity and Proper Use of Federal Funding
- A Check for SFA Compliance with Regulations

Whenever federal money is involved, there is someone watching someone watching someone else. Administrative Reviews conducted by CANS ensures integrity of the school meal program requirements are being implemented properly and effectively.

You monitor your sites and have fiscal audits.

We review your program.

We have management evaluations of our programs.

Federal programs have the Office of Management and Budget and Office of Inspector General.

Areas of Review

Critical Areas

Performance Standard 1

- Student Eligibility
- Meal Counts
- Reimbursement

Performance Standard 2

- Meal Pattern & Components
- Dietary Specifications

General Areas

- Resource Management
 - Financial
- General Program Compliance
 - Civil Rights, Food Safety, Smart Snacks, Professional Standards, etc.
- Other Federal Programs
 - After School Snack
 - Special Milk Program
 - FFVP

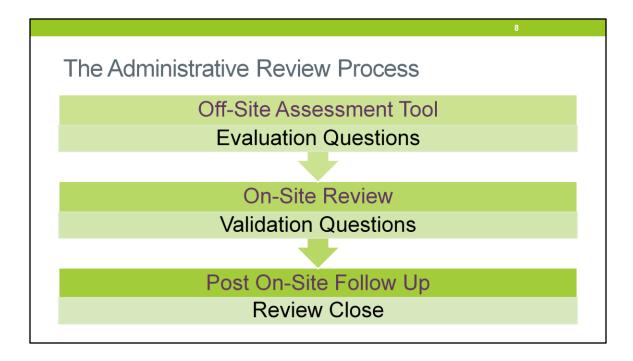
Generally, the school meal programs Administrative Review focuses on two primary components:

Critical Areas of Review, and General Areas of Review

The Critical Areas of Review are Performance Standard 1, which encompasses Meal Access & Reimbursement, AND

Performance Standard 2 which is also a critical area, this area includes Meal Pattern & Nutritional Quality.

All the review areas are essential for program compliance. So the General Areas of the review which include Resource Management and General Program Compliance are as important as the Critical Areas.



There is a three step process used in the new administrative review to determine the SFA's level of compliance with Federal Regulations.

The first step involves the use of the a new Off-Site Assessment Tool. The Off-Site Assessment is intended to be conducted in advance of the on-site portion of the administrative review. The off-site tool will be emailed directly to the Authorized Representative, Food Service manager, and Claim Rep. The off-site tool is linked to the CANS NSLP website.

During the Off-site Assessment process, a variety of methods will be used to fill-out the Tool. (e.g., examination of recently filed reports, a series of pre-review questions for the SFA to fill out, collection of information provided during annual renewal period).

The Off-site Assessment Tool will provide CANS reviewers with some baseline evaluation information about the different processes in place. This information could alert the reviewer to potential areas of non-compliance or technical assistance needs well in advance of the on-site portion of the administrative review.

The information communicated during the Off-Site Assessment will be validated by the reviewer on-site through a series of questions that will be answered based on staff interviews, reviewer observation, etc.

The reviewer will also document any Technical Assistance that is provided to the SFA at any point in the review. Areas of non-compliance may result in Fiscal Action.

The reviewer goes back home and finishes the review up, following up with the SFA when necessary for documented corrective action until the review is ready to close.

Access &	Nutritional Quality/	Resource	General Program	Other Federal Program
Reimbursement Eligibility Determination	Meal Pattern Meal Components	Management Nonprofit School Food Service Acct	Compliance Civil Rights	Reviews Afterschool Snack
Benefit Issuance	Offer versus Serve	Paid Lunch Equity	SFA On-site Monitoring	Seamless Summer Option
Direct Certification	Dietary Specifications & Nutrient Analysis	Revenue from Non-program Foods	Local Wellness Policy	Fresh Fruit and Vegetable Program
Verification		Indirect Costs	Competitive Foods/Smart Snacks	Special Milk Program
Meal Counting			Professional Standards	Special Provision 2, 3, & CEP
Claiming			Water	
Reimbursement			Food Safety, Storage, & Buy American	
			Reporting & Recordkeeping	
			SBP & SSO Outreach	

The new Administrative Review approach has been organized into five monitoring areas:

- Access and Reimbursement, again, which corresponds to Performance Standard 1;
- Nutritional Quality/Meal Pattern, which corresponds to Performance Standard 2;
- Resource Management and General Program Compliance, which collectively cover the General Areas of review;
- and Other Federal Program Reviews, which are comprised of both Critical and General areas.

On this slide you can see that within each monitoring section are several modules, each of which addresses a specific review area.

For each module you see listed here, both pre-visit (off-site) and on-site visit materials have been developed where appropriate, to allow for the most efficient collection, submittal and analysis of data and information for a given review area.

Preparation IS KEY

- · Use the AR Summary & Self Evaluation Checklist
- Conduct a meeting with your staff to help them understand their role in the review and begin preparations!
- · Admin Review has 3 parts:
 - Pre Visit Procedures: Business Office & Food Service
 - On-site Visit Review: Business Office, Food Service, & Others involved in program requirements
 - Follow-up and Close: Business Office & Food Service

Since I have never gone through one before, I have started to look at some of the online content.

I had all-staff training this week and I went through this info with them so they know what they could be responsible for.

AR Includes 3 parts

Off-site Assessment (Director and Managers) Pre Visit Procedures On-site Review (ALL STAFF)

Follow-up and Close (Director and Managers)

Pre-Visit Procedures: Completed by CANS

- Notify the Authorized Representative and Food Service Director: You are on the list this school year!
- · Send the SFA the Off-Site Assessment document
- Review the completed Off-Site Assessment document and clarify questions
- Nail down some pre-visit information:
 - Who will be involved, specifics on the SFA's program
- · Select sites for review
- Schedule an on-site visit date

How You Can Prepare for the Admin Review

Meal Access and Reimbursement Performance Standard (PS) 1

- · Certification and Benefit Issuance
 - Review SFA eligibility documentation and student eligibility roster
- Verification
 - Review your verified applications and process

How You Can Prepare for the Admin Review

Meal Access and Reimbursement PS 1

- Meal Counting & Claiming watch your meal counts!
 - Is someone ALWAYS stationed at the point of service meal count station?
 - Do meal count staff monitor meals for completeness and count only eligible student meals?
 - Do meal count staff properly charge a la cart prices?
 - Does your meal count method protect confidentiality of student meal benefits?
 - Are monthly edit checks completed to ensure claim accuracy?

How You Can Prepare for the Admin Review

Meal Pattern and Nutritional Quality PS 2

- Meal Components and Quantities
 - Watch meal service.
 - Are all the required meal components offered to all students?
 - Are staff properly telling students what they can and cannot take?
 - What happens when a food runs out?
 - What happens when a student refuses a reimbursable meal?
 Does the school charge for meals that are not reimbursable meals?

How You Can Prepare for the Admin Review

Meal Pattern and Nutritional Quality PS 2

- Offer versus Serve (OVS)
 - · What is your OVS selection in your iCAN Site Application?
 - · Watch meal service
 - Do staff understand the minimum component requirements?
 - Do staff know the difference between a complete (reimbursable) meal and a la carte or seconds purchase and how to charge accordingly?
 - Is signage posted for students to understand meal requirements?
 - Do staff accurately judge food quantities when food is self serve?

How You Can Prepare for the Admin Review

Meal Pattern and Nutritional Quality PS 2

- Dietary Specifications and Nutrient Analysis
 - · Are daily Production Records made?
 - Are all the components on the Production Records filled out?
 - Does the menu planner understand how to record a meal on the production record
 - Does the menu planner ensure that average calories, saturated fat, and sodium requirements are met; do they check labels for zero trans fat?
 - Are they asking for American agricultural products? Do they collect documentation from the vendor/manufacturer for food grown/processed outside of the US?

How You Can Prepare for the Admin Review

Resource Management

- Nonprofit Food Service Account
 - Do your reimbursements go into a dedicated foodservice account?
 - Do you have a method to verify only allowable costs are charged to this account?
- Paid Lunch Equity (PLE)
 - Is the PLE tool completed and student paid prices set properly or a source of nonfederal funding found to supplement PLE requirements?

How You Can Prepare for the Admin Review

Resource Management

- Revenue from NonProgram Foods
 - Adult meals, purchased seconds, a la cart, other foods purchased using FS dollars.
 - Is the USDA Non Program Tool completed and results are compliant?
- Indirect Costs
 - Are indirect costs charged to the FS account? Do you have approval from both a Cognizant agency and from CANS? Are indirect costs equitably charged to all federal programs?

How You Can Prepare for the Admin Review

General Program Compliance

- Civil rights
 - Is the "And Justice For All" poster in the meal service area?
 - Did staff receive <u>ANNUAL</u> Child Nutrition Civil Rights training? This
 is different than the Title Civil Rights training.
 - Do all students have equal access to your meal program?
 - Do your program materials and website contain the nondiscrimination statement?
 - Check how your school handles complaints of civil rights discrimination within the school meal program. Is it a written or informal policy that meets requirements in <u>CANS NSLP memo</u> 108?

How You Can Prepare for the Admin Review

General Program Compliance

- Onsite Monitoring (required for SFAs with more than 1 feeding site)
 - Has monitoring been completed for each school/feeding site prior to Feb 1?
 - Are the results recorded on the Onsite Monitoring Worksheet?
- Local School Wellness Policy
 - Does it meet the final requirements?
 - TIP: Use the Wellness Policy Self-Checklist

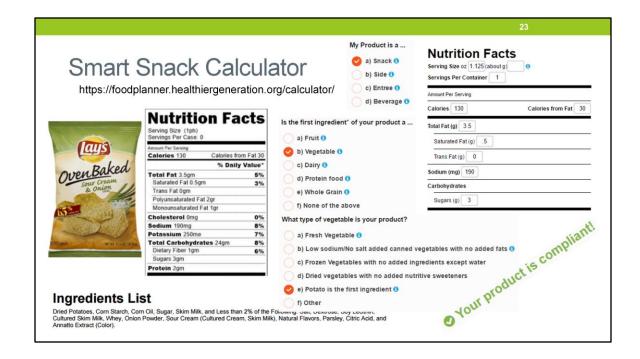
Wellness Policy – Final Rule July 1, 2017

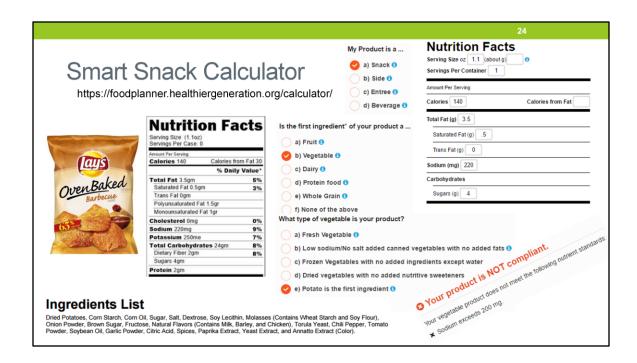
- Permit parents, students, other school staff, general public to participate in reviewing and updating policy
- · Identify a wellness leader to enforce compliance within district
- Inform and update the public on content of policy updates
- Include required components:
 - · Goals for nutrition promotion, PE, other school wellness activities.
 - Guidelines for all foods sold in schools meals and smart snacks
 - Policy for food and beverages available in schools parties, incentives, fundraisers
 - Food and beverage marketing policy
 - Description of public involvement, updates, leadership and evaluation plan.

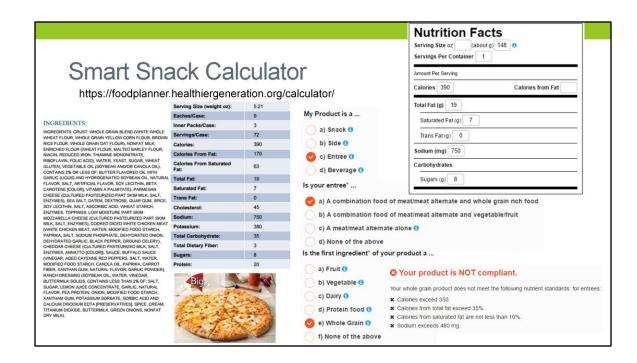
How You Can Prepare for the Admin Review

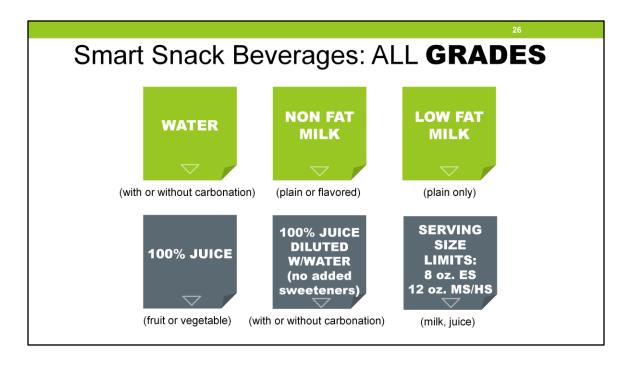
General Program Compliance

- Smart Snacks
 - Applies to all food sold to students during school day outside of reimbursable meal
 - Ensure all foods sold during school day are Smart Snack compliant
 - · A la Carte
 - Vending Machines
 - Exempt Fundraisers





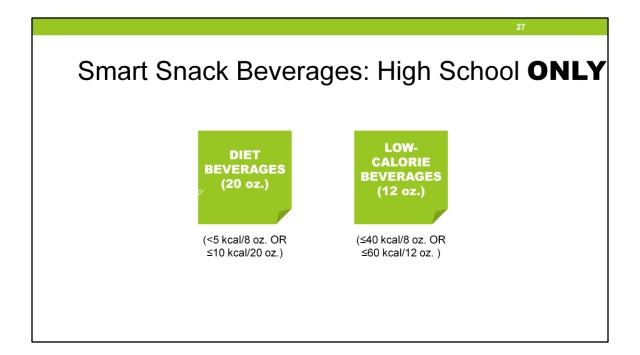




Next let's explore beverages.

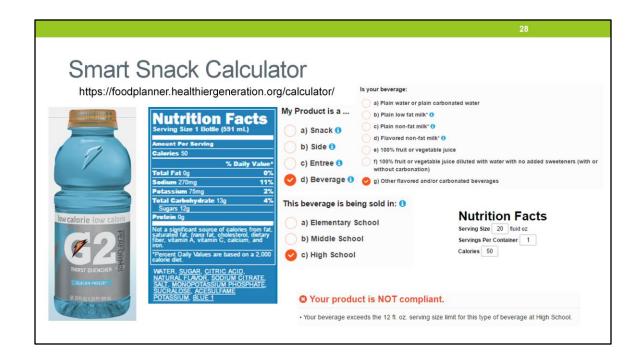
NO caffeinated beverages are allowed at elementary and middle school. Only plain water, non-fat and low fat milk and 100% fruit or vegetable juice are allowed at elementary and middle school.

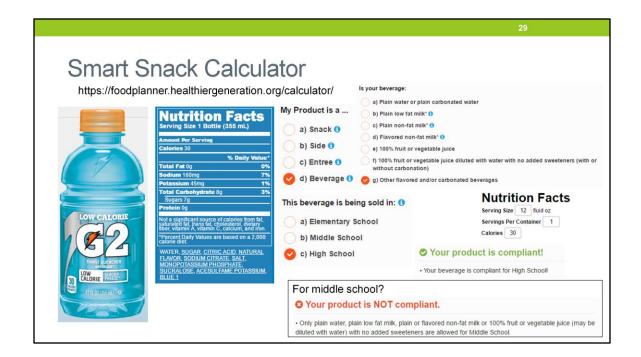
In addition, there are serving size limits for milk and juice. At elementary school, milk and juice is limited to 8 oz. or less. At middle and high school, milk and juice is limited to 12 oz. or less.

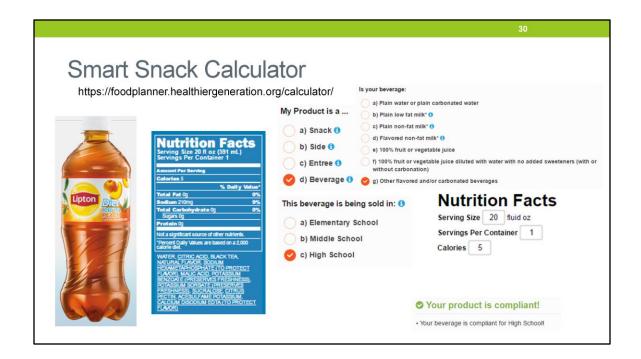


Some additional flavored and/or carbonated beverages are allowed at high school (they must meet certain calorie and serving size limits).

Diet beverages are limited to 20 oz. or less. Low calorie beverages are limited to 12 oz. or less.







How You Can Prepare for the Admin Review

General Program Compliance

- · Professional Standards
 - Every school must have at least one "Food Service Director"
 - Do all staff have the appropriate minimum number of training hours?
 - · Are they recorded?
 - Food Service Director 12 hours
 - Food Service Manager 10 hours
 - · Food Service Staff 6 hours
 - · Part-time Staff 4 hours

How You Can Prepare for the Admin Review

General Program Compliance

- Water
 - Available for Breakfast AND Lunch?
- Food safety
 - Do we have a food safety plan (HACCP)?
 - · Have staff reviewed the plan?
 - Do we take temperatures and correct if temp is not right?
 - · Have we had 2 health inspections per year?

How You Can Prepare for the Admin Review

Other Federal Programs

- · Afterschool Snack Program
 - · Offsite OR Onsite review
- · Seamless Summer Option
 - · Onsite review the same year of a school lunch review
- · Fresh Fruit and Vegetable Program
 - Onsite review
- · Special Milk Program
 - · Offsite OR Onsite review

Administrative Review Guidance & Tools

http://doe.sd.gov/cans/nslp.aspx

http://www.fns.usda.gov/school-meals/administrative-review-manual

SCHOOL NUTRITION PROGRAM FOR BUSINESS MANAGERS 101

Some Basic Reminders

General Reminders

- Restricted Food Service Account
 - All revenue that goes into the account must be allowable
 - Moving reimbursement from FS account into another account is not allowable in most cases
 - For example: Afterschool snack reimbursement is received in FS Account and then paid to another account for 21st Century payment = Not Allowed!
- Allowable/unallowable costs
- Procurement:
 - · Using the Most Restrictive of Federal, State, and Local rules

Definition of Nonprofit School Food Service Account

Nonprofit school food service account means the restricted account in which all of the revenue from all food service operations conducted by the school food authority principally for the benefit of school children is retained and used only for the operation or improvement of the nonprofit school food service. This account shall include, as appropriate, non-Federal funds used to support student paid lunch prices, and proceeds from nonprogram foods.

7 CFR 210.2 and 210.14

Paid Lunch Equity (PLE Tool)

- Must be completed every year
- The tool for SY17-18 is posted on the CANS NSLP website
- If you meet specific criteria, you can apply for a waiver this year

Adult Meal Prices...Why are they higher?

- · Schools do not get reimbursed for adult meals
- They are nonprogram foods
- Adult portions should reflect the same portions as student meals (high school serving size)
- A simple calculation to figure out the lowest adult meal charge:
 Your Free Rate of Reimbursement + Federal Performance Rate of Reimbursement + Value Of USDA Foods (commodity value)

$$$3.18 + $0.06 + $0.23 = $3.47$$

Key area here is that Student meal reimbursement can't be subsidizing the adult meal price.

Can we state that if a district wants their adults to have more then the general fund must be charged.

Movie ticket example Adult price and child price get same thing

Other costs – Teachers asking for a stack of disposable bowls or other item. Must be charged out. Not an allowable cost for the nutrition program

Lunchroom supervision Yes

NonProgram Food Revenue Tool

- What are nonprogram foods?
 - Adult meals, extra milk, seconds, and any food that is paid for out of the school food service account that is not a reimbursable meal
- How to fill out the tool:
 - Enter information into the peach/tan colored boxes
 - Use the prior school year information or a reference period for an estimate
- · What the tool does:
 - Determines whether or not your school is charging enough for nonprogram foods

Requirements of Nonprogram Foods Revenue

Formula:

Total Nonprogram Foods Revenue

Total Program Revenue

>

Total Nonprogram Food Costs

Total Food Costs

Calculate Average Meal Cost

- How much does it cost, on average, to produce a meal in your school district?
- Determine the raw food cost of the item offered for sale.
- Identify the desired food-cost percentage for the school nutrition program operation.
- To establish a base selling price, divide the item's food cost by the desired food cost percentage mark-up.

Daily Meal Cost:

I have them write down everything they use and what the current cost is.

Food, commodities, paper products, wage

Take that number by how many people served to get cost per meal.

Recently looked at adding wages/salaries into that equation.

This gives us a good idea of which meals are our most expensive to prepare. Helps us stay in check.

Revenue Requirement Calculation Example

Cost for Reimbursable (Program) Food: \$45,000
Cost of Nonprogram Food: \$5,000
Total Food Costs: \$50,000
Total Revenue: \$100,000

By math: Your Total Nonprogram Food Revenue: \$5,000

This example shows the SFA is \$5,000 dollars short of Nonprogram Food Revenue to meet minimum requirement

Unpaid Meal Requirements

- Each district must have a written and communicated policy in place by July 1, 2017
- Required to have a policy or standard procedures on how zero and negative balances (unpaid meal charges) are handled by the SFA
- Must be provided to all households at the start of the SY and to transferring households
- USDA Unpaid Meal Charges website: https://www.fns.usda.gov/school-meals/unpaid-meal-charges

Unpaid Meal Charges Example

"Elementary students will be allowed to charge the value of up to 5 lunch meals to their account except for the last two weeks of school when no charging is allowed. After the student reaches a negative balance equivalent to 5 lunch meals, a hot meal will no longer be served and the student will be provided an alternative meal until the account has a positive balance. Once a student has \$5.00 remaining in his or her account, a low balance notification will be sent home with the student. This low balance notification will continue to be sent home daily until the account is more than \$5.00 positive. Parents also may sign up to receive electronic notification of low balances via the online school lunch payment system."

Unpaid Meal Charges Example

Middle school students is the same as elementary except they are told discretely while going through line and given a note to take home.

High school students is similar however once they have reached negative 5 meals they are no longer served unless they want to pay in cash.

MAXIMIZING YOUR ENTITLEMENT DOLLARS

Commodities/USDA Foods

- · How is entitlement determined?
 - The total lunches served (TLS) in the prior completed school year multiplied by a planned assistance level (PAL) set each year in July based on certain indexes set by Congress in the original act
 - TLS X PAL = Entitlement

How can Entitlement be spent?

- Each year, by March, surveys are open on iCAN for agencies to allocate how they want the state agency to purchase USDA Foods
 - · Survey types are for:
 - Direct Delivery (brown box) to South Dakota's warehouse
 - FFAVORS USDA Foods Fresh DoD
 - Processor Delivery (Bulk to Processor)
 - Net Off Invoice (NOI)

Direct Delivery (brown box) to South Dakota's warehouse

- Frozen 40 pound box or smaller
- Number 10 can or smaller
- Refrigerated 40 pound container or smaller

Processor Delivery (Bulk to Processor)

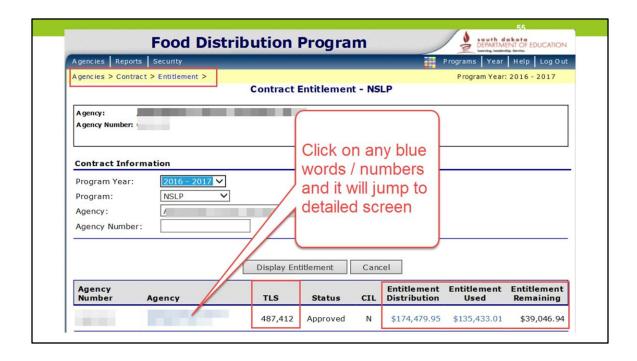
FFAVORS - USDA Foods Fresh DoD

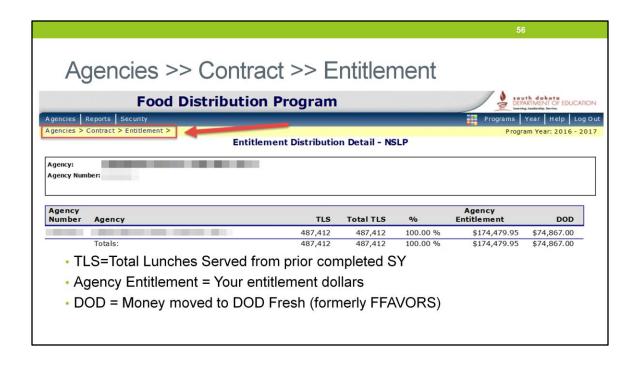
- USDA Foods entitlement funds set aside for fresh fruits and vegetables purchases
 - Agencies log into the DoD FFAVORS website and place orders for weekly or bi-weekly deliveries through the contracted distributor
 - Currently the South Dakota FFAVORS contract is with CashWa Distributing

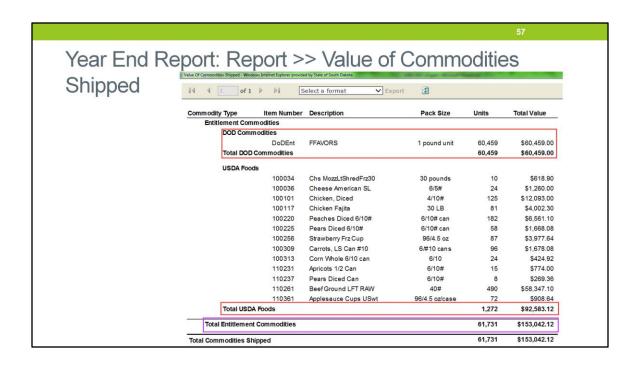
Net Off Invoice (NOI)

- A few schools in South Dakota have asked to procure their own processing items through distributors
 - Additional training is required for new agencies
- Purchases are tracked from the processor to the agency storeroom and monitored through processor supported websites









CAUTION ::: This only contains SHIPPED Orders not open or processed orders.

HOT TOPICS & DISCUSSION

What's On Your Mind?

Block Grant impact on Pierre

Total paid Lunches for last school year X's .29
 \$ 55,296.00

• Total lunches all categories X's .06 \$ 17,155.00

Total Breakfast reimbursement all meals
 \$ 48,100.00

Total USDA foods received last year
 \$ 84,711.00

If any summer or other programs FFV total funds

N/A

DISTRICT TOTAL \$205,262.00

Block Grant impact on Brandon Valley

Total paid Lunches for last school year X's .29
Total lunches all categories
X's .06
\$108,191.00
\$32,820.00

Total Breakfast reimbursement all meals
 \$ 87,778.00

Total USDA foods received last year \$172,573.00

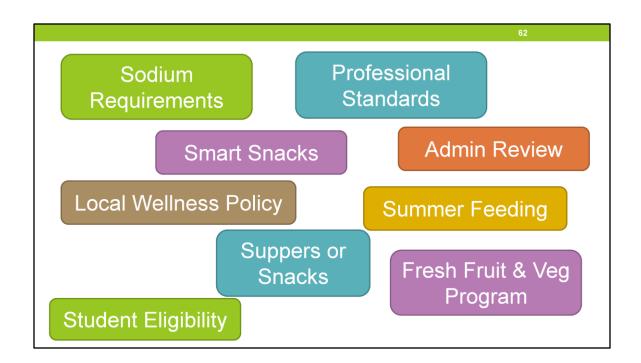
If any summer or other programs FFV total funds

N/A

DISTRICT TOTAL \$401,362.00

Where does the lack of funding get made up?

- The General Fund and this equals fewer dollars spent on education.
- Capped funds
- Does our state have the bandwidth to manage?
- State could determine funds may be allocated differently to schools.
- If more free/red added to district where do funds come from for these new students?
- Natural disasters or major layoffs would significantly impact funding used up faster and again where will the funds be made up?
- We need you to make sure our Senators and Congresswoman know our state can't afford Child Nutrition programs to be Block Grants





Contact Us!

CANS Office

• Email: DOE.SchoolLunch@state.sd.us

• Phone: 605-773-3413

School Nutrition Association of SD

http://www.snasd.org/

This institution is an equal opportunity provider.

Business Officials Update, April 2017

This training credits for 3 hours of training in

Key Areas: 1- Nutrition and 3 – Administration

1170 USDA Foods, 3260 Preparation for Administrative Review, 3300 Financial Management

Your Name:

Date of Training:

